

From: [Hall, Steven G.](#)
To: [Fowlow, Jeffrey](#); [Nuchims, Eric](#)
Subject: RE: Conference Call with Julie Roble about Ashue Road
Date: Wednesday, January 23, 2013 2:42:04 PM

Jeff -

When we discussed the removal action, she agreed with our approach to use equipment to search through the debris pile for ACM or other suspect material that is inaccessible at the surface. She also liked the idea of us collecting air samples (personal and area) during the removal assessment to provide additional data.

We did discuss action levels briefly, and the short answer is that it is complicated and would depend on other site factors. See the following for a longer discussion:

For the action levels, we agreed that it is difficult to state them as single pass/fail thresholds, because a lot would depend on the context. We would also like to see the relevant reports to get more information on the nature of the ACM from the school and other details about the abatement project. For example, what exactly does "ACM soil" mean? If there is a chance that ACM-contaminated soil may be present in the debris pile, that could be a very different scenario compared to an ACM building material.

For the air sampling, she agreed that a non-detect result by itself doesn't mean that there is no concern; for example, the presence of ACM in the debris pile would require action, regardless of the air sample results. On the other hand, detectable fibers in an air sample would require evaluation to determine the level of risk and the need for further investigation and/or removal action.

I do think that it is possible that we could create some decision trees for the debris piles and air samples that could act as some kind of action level or guidance. If you like, we can draft something and run it by Julie.

Let us know if you want to discuss.

Thanks,
Steve

From: Fowlow.Jeffrey@epamail.epa.gov [mailto:Fowlow.Jeffrey@epamail.epa.gov]
Sent: Wednesday, January 23, 2013 2:43 PM

To: Nuchims, Eric
Cc: Hall, Steven G.
Subject: Re: Conference Call with Julie Roble about Ashue Road

Bury in place would involve cost to bring (even more) fill to an unpermitted landfill. The Tribe and County will LOVE that. Also. it would require engineering, some sort of barrier, a deed restriction, and a post-removal site control agreement. We'll consider it IF we get that far.

I will attempt to locate a copy of the abatement report.

I am mostly concerned with a good removal assessment for now. Did you discuss acceptable action levels?

▼ "Nuchims, Eric" ---01/23/2013 12:00:10 PM---Jeff Here are the talking points that we discussed with Julie yesterday.

From: "Nuchims, Eric" <ENuchims@ene.com>
To: Jeffrey Fowlow/R10/USEPA/US@EPA
Cc: "Hall, Steven G." <SHall@ene.com>
Date: 01/23/2013 12:00 PM
Subject: Conference Call with Julie Roble about Ashue Road

Jeff

Here are the talking points that we discussed with Julie yesterday.

- Consider "bury in place" as an option for the site based on being the lowest cost alternative. We understand that the Yakama Nation and the county would have to buy off on that.
- We would like to obtain and review relevant documents (inspection reports, specs for school project, any clearance testing, information on quantities and types of ACM removed from the school) to help evaluate site.
- The necessity and scope of a removal action is unclear based on available data; therefore, information from relevant project documents (see above) and data from a removal assessment could help make this determination.
- During the "test pitting" of the debris pile (i.e., using equipment to search for buried suspect materials) we should also collect "opportunistic" personal and area air samples. Air results could be useful in determining the need for further removal actions.

Steve and I both independently ball parked the cost at 50K based on a backhoe subcontract, air sampling and monitoring, potential bulk samples if necessary, about a week's worth of field time, lab costs, and removal assessment report.

Eric Nuchims, *Chemist*

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